

**UNITED STATES BANKRUPTCY COURT  
FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA**

**In re: Peter Paul Mitrano  
Debtor(s),**

**Bankruptcy #10-20476**

**Chapter 13**

**JPMorgan Chase Bank, National Association  
Movant,**

**Vs,**

**Peter Paul Mitrano, Debtor(s)  
UNITED STATES TRUSTEE, U.S. Trustee  
Respondent(s)**

**OBJECTION TO PLAN**

AND now, comes **JPMorgan Chase Bank, National Association** (“Creditor”) a secured creditor in the above-referenced Bankruptcy case, by and through its counsel, Daniel J. Mancini and files this Objection to the Debtors’ Plan dated June 15, 2010.

Creditor filed a Proof of Claim listing the pre-petition arrearage owed to it by the Debtors in the amount of \$53,205.87. Creditor’s Proof of Claim is attached and made part of this Objection.

Debtors’ Plan does not list Creditor. Accordingly, Debtors’ proposed Plan should be amended to state the correct pre-petition arrearage amount owed to Creditor in the amount of \$53,205.87 and list **JPMorgan Chase Bank, National Association** as a secured creditor.

WHEREFORE, Creditor objects to the approval of the Debtors’ Plan as proposed and prays that the Amended Plan not be confirmed and/or that it be amended or modified appropriately prior to the confirmation hearing.

Respectfully Submitted,

/s/ Daniel J. Mancini, Esq.

Daniel J. Mancini, Esquire, WV ID 11168  
201A Fairview Drive  
Monaca, PA 15061  
(724) 728-4233

[amanda@attorneydanielmancini.com](mailto:amanda@attorneydanielmancini.com)

*Counsel for JPMorgan Chase Bank, National Association.*